

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-203-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.;)	
MICRON SEMICONDUCTOR)	
PRODUCTS, INC.; MICRON)	
TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF
PLAINTIFF NETLIST, INC.'S MOTION TO STRIKE CERTAIN OPINIONS
OF DEFENDANTS' EXPERT JOHN B. HALBERT**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist, Inc.’s Motion to Strike Certain Opinions of Defendants’ Expert John B. Halbert. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct copy of the Expert Report of John B. Halbert, dated October 4, 2023.

3. Attached as **Exhibit 2** is a true and correct copy of the Rebuttal Expert Report of John B. Halbert, dated October 30, 2023.

4. Attached as **Exhibit 3** is a true and correct copy of Exhibit 2 to the Deposition of John B. Halbert, dated September 30, 2023.

5. Attached as **Exhibit 4** is a true and correct excerpted copy of Defendants’ Invalidity Contentions, dated November 21, 2022.

6. Attached as **Exhibit 5** is a true and correct excerpted copy of the Pretrial Conference Transcript from Netlist v. Samsung, Case No. 2:21-cv-463-JRG, dated March 28, 2023.

7. Attached as **Exhibit 6** is a true and correct excerpted copy of Defendants’ Sixth Supplemental Responses and Objections to Plaintiff Netlist, Inc.’s First Set of Interrogatories, dated September 20, 2023.

8. Attached as **Exhibit 7** is a true and correct copy of the Deposition Transcript of John B. Halbert, dated September 30, 2023.

9. Attached as **Exhibit 8** a true and correct excerpted copy of the transcript from the motion hearing dated October 10, 2023.

10. Attached as **Exhibit 9** is a true and correct copy of the Expert Report of John B. Halbert from *Netlist v. Samsung*, Case No. 2:21-CV-00462-JRG.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 14, 2023, in Los Angeles, California.

By /s/ Jason G. Sheasby
Jason G. Sheasby